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11 *Attorneys for Plaintiff*

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15
16 IN RE: UBER TECHNOLOGIES, INC.,
17 PASSENGER SEXUAL ASSAULT
LITIGATION

Case 3:23-md-03084-CRB

MDL No. 3084

18 **ATTORNEY WALT CUBBERLY'S**
19 **DECLARATION IN SUPPORT OF**
20 **PLAINTIFFS' OPPOSITION TO**
21 **DEFENDANTS' MOTION DISMISS**
CASES FOR FAILURE TO COMPLY
WITH PTO 10

22 This Document Relates to:

23 *WHB 1293 v. Uber Technologies, Inc., et*
24 *al., No. 3:24-cv-04526*

25 *WHB 1027 v. Uber Technologies, Inc., et*
26 *al., No. 3:24-cv-04820*

27 *WHB 928 v. Uber Technologies, Inc., et al.,*
28 *No. 3:24-cv-04825*

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 *WHB 511 v. Uber Technologies, Inc., et al.,*
2 *No. 3:24-cv-04842*

3 *WHB 860 v. Uber Technologies, Inc., et al.,*
4 *No. 3:24-cv-04845*

5 *WHB 1023 v. Uber Technologies, Inc., et*
6 *al., No. 3:24-cv-04877*

7 *WHB 1002 v. Uber Technologies, Inc., et*
8 *al., No. 3:24-cv-04885*

9 *WHB 1497 v. Uber Technologies, Inc., et*
10 *al., No. 3:24-cv-04891*

11 *WHB 310 v. Uber Technologies, Inc., et al.,*
12 *No. 3:24-cv-04903*

13 *WHB 333 v. Uber Technologies, Inc., et al.,*
14 *No. 3:24-cv-04905*

15 *WHB 56 v. Uber Technologies, Inc., et al.,*
16 *No. 3:24-cv-04908*

17 *WHB 312 v. Uber Technologies, Inc., et al.,*
18 *No. 3:24-cv-04928*

19 *WHB 1590 v. Uber Technologies, Inc., et*
20 *al., No. 3:24-cv-04946*

21 *WHB 1667 v. Uber Technologies, Inc., et*
22 *al., No. 3:24-cv-04957*

23 *WHB 1960 v. Uber Technologies, Inc., et*
24 *al., No. 3:24-cv-04960*

25 *WHB 1619 v. Uber Technologies, Inc., et*
26 *al., No. 3:24-cv-04961*

27 *WHB 689 v. Uber Technologies, Inc., et al.,*
28 *No. 3:24-cv-04965*

WHB 676 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05024

WHB 1837 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05033

WHB 1902 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05040

WHB 1431 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05057

1 *WHB 666 v. Uber Technologies, Inc., et al.,*
2 *No. 3:24-cv-05127*

3 *WHB 1394 v. Uber Technologies, Inc., et*
4 *al., No. 3:24-cv-05237*

5 *WHB 466 v. Uber Technologies, Inc., et al.,*
6 *No. 3:24-cv-05265*

7 *WHB 1832 v. Uber Technologies, Inc., et*
8 *al., No. 3:24-cv-05305*

9 *WHB 645 v. Uber Technologies, Inc., et al.,*
10 *No. 3:24-cv-05356*

11 *WHB 703 v. Uber Technologies, Inc., et al.,*
12 *No. 3:24-cv-05361*

13 *WHB 1272 v. Uber Technologies, Inc., et*
14 *al., No. 3:24-cv-05366*

15 *WHB 994 v. Uber Technologies, Inc., et al.,*
16 *No. 3:24-cv-05452*

17 *WHB 1856 v. Uber Technologies, Inc., et*
18 *al., No. 3:24-cv-05461*

19 *WHB 1021 v. Uber Technologies, Inc., et*
20 *al., No. 3:24-cv-05466*

21 *WHB 1661 v. Uber Technologies, Inc., et*
22 *al., No. 3:24-cv-05468*

23 *WHB 1414 v. Uber Technologies, Inc., et*
24 *al., No. 3:24-cv-05495*

25 *WHB 1468 v. Uber Technologies, Inc., et*
26 *al., No. 3:24-cv-05500*

27 *WHB 1043 v. Uber Technologies, Inc., et*
28 *al., No. 3:24-cv-05501*

WHB 1840 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05554

WHB 1677 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05556

WHB 1659 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05565

WHB 1618 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05572

1 *WHB 1943 v. Uber Technologies, Inc., et*
2 *al., No. 3:24-cv-05598*

3 *WHB 1552 v. Uber Technologies, Inc., et*
4 *al., No. 3:24-cv-05599*

5 *WHB 1880 v. Uber Technologies, Inc., et*
6 *al., No. 3:24-cv-05602*

7 *WHB 1381 v. Uber Technologies, Inc., et*
8 *al., No. 3:24-cv-05603*

9 *WHB 632 v. Uber Technologies, Inc., et al.,*
10 *No. 3:24-cv-05604*

11 *WHB 1260 v. Uber Technologies, Inc., et*
12 *al., No. 3:24-cv-05613*

13 *WHB 1544 v. Uber Technologies, Inc., et*
14 *al., No. 3:24-cv-05622*

15 *WHB 438 v. Uber Technologies, Inc., et al.,*
16 *No. 3:24-cv-05631-CRB*

17 *WHB 1611 v. Uber Technologies, Inc., et*
18 *al., No. 3:24-cv-05665*

19 *WHB 891 v. Uber Technologies, Inc., et al.,*
20 *No. 3:24-cv-05666-CRB*

21 *WHB 1348 v. Uber Technologies, Inc., et*
22 *al., No. 3:24-cv-05669*

23 *WHB 946 v. Uber Technologies, Inc., et al.,*
24 *No. 3:24-cv-05698*

25 *WHB 1142 v. Uber Technologies, Inc., et*
26 *al., No. 3:24-cv-05712*

27 *WHB 1057 v. Uber Technologies, Inc., et*
28 *al., No. 3:24-cv-05715*

WHB 1470 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05716

WHB 494 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05767

WHB 871 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05770

WHB 935 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05776

1 *WHB 884 v. Uber Technologies, Inc., et al.,*
2 *No. 3:24-cv-05948*

3 *WHB 991 v. Uber Technologies, Inc., et al.,*
4 *No. 3:24-cv-05959*

5 *DMA 1 v. Uber Technologies, Inc., et al.,*
6 *No. 3:24-cv-05968*

7 *WHB 1556 v. Uber Technologies, Inc., et*
8 *al., No. 3:24-cv-05986*

9 *WHB 1999 v. Uber Technologies, Inc., et*
10 *al., No. 3:24-cv-07048*

11 *WHB 2060 v. Uber Technologies, Inc., et*
12 *al., No. 3:25-cv-01092*

13 *WHB 2061 v. Uber Technologies, Inc., et*
14 *al., No. 3:25-cv-01095*

15 *WHB 2062 v. Uber Technologies, Inc., et*
16 *al., No. 3:25-cv-01098*

17 *WHB 2063 v. Uber Technologies, Inc., et*
18 *al., No. 3:25-cv-01099*

19 *WHB 2064 v. Uber Technologies, Inc., et*
20 *al., No. 3:25-cv-01101*

21 *WHB 2067 v. Uber Technologies, Inc., et*
22 *al., No. 3:25-cv-01122*

23 *WHB 2070 v. Uber Technologies, Inc., et*
24 *al., No. 3:25-cv-01126*

25 *WHB 2071 v. Uber Technologies, Inc., et*
26 *al., No. 3:25-cv-01130*

27 *WHB 2073 v. Uber Technologies, Inc., et*
28 *al., No. 3:25-cv-01143*

WHB 2075 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01148

WHB 2077 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01150

WHB 2082 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01177

WHB 2084 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01179

1 *WHB 2036 v. Uber Technologies, Inc., et*
2 *al., No. 3:25-cv-01180*

3 *WHB 2039 v. Uber Technologies, Inc., et*
4 *al., No. 3:25-cv-01202*

5 *WHB 2041 v. Uber Technologies, Inc., et*
6 *al., No. 3:25-cv-01205*

7 *WHB 2043 v. Uber Technologies, Inc., et*
8 *al., No. 3:25-cv-01207*

9 *WHB 2044 v. Uber Technologies, Inc., et*
10 *al., No. 3:25-cv-01209*

11 *WHB 2047 v. Uber Technologies, Inc., et*
12 *al., No. 3:25-cv-01215*

13 *WHB 2048 v. Uber Technologies, Inc., et*
14 *al., No. 3:25-cv-01216*

15 *WHB 2049 v. Uber Technologies, Inc., et*
16 *al., No. 3:25-cv-01218*

17 *WHB 2051 v. Uber Technologies, Inc., et*
18 *al., No. 3:25-cv-01226*

19 *WHB 2054 v. Uber Technologies, Inc., et*
20 *al., No. 3:25-cv-01244*

21 *WHB 2057 v. Uber Technologies, Inc., et*
22 *al., No. 3:25-cv-01249*

23 *WHB 2059 v. Uber Technologies, Inc., et*
24 *al., No. 3:25-cv-01255*

25 I, Walt Cubberly, declare as follows:

- 26 1. I am an attorney at Williams Hart & Boundas LLP admitted to practice before the courts
27 of the State of California. I am one of the counsels of record for all filed WHB claimants.
28 I have personal knowledge of the matters set forth herein, and if called to testify, I would
testify competently to the information below:
2. This declaration is made in support of the Opposition to Defendants' Motion to Dismiss
Cases for Failure to Comply with PTO 10.

- 1 3. Plaintiff WHB 860, ID 1549 uploaded a signed verification to MDL Centrality on August 25,
2 2025. **Exhibit A** to the Declaration of Walt Cubberly.
- 3 4. Plaintiff WHB 632, ID 2134 uploaded a signed verification to MDL Centrality on September 3,
4 2025. **Exhibit B** to the Declaration of Walt Cubberly.
- 5 5. Plaintiff WHB 333, ID 1595 uploaded a signed verification to MDL Centrality on September 3,
6 2025. **Exhibit C** to the Declaration of Walt Cubberly.
- 7 6. Plaintiff WHB 1677, ID 1688 uploaded a signed verification to MDL Centrality on September 3,
8 2025. **Exhibit D** to the Declaration of Walt Cubberly.
- 9 7. Plaintiff WHB 2067, ID 2859 uploaded a signed verification to MDL Centrality on September 4,
10 2025. **Exhibit E** to the Declaration of Walt Cubberly.
- 11 8. Plaintiff WHB 1840, ID 2056 uploaded a signed release to MDL Centrality on June 26, 2025.
12 **Exhibit F** to the Declaration of Walt Cubberly.
- 13 9. Plaintiff WHB 1002, ID 1627 uploaded a signed release to MDL Centrality on June 30, 2025.
14 **Exhibit G** to the Declaration of Walt Cubberly.
- 15 10. Plaintiff WHB 310, ID 1616 uploaded a signed release to MDL Centrality on September 3, 2025.
16 **Exhibit H** to the Declaration of Walt Cubberly.
- 17 11. Plaintiff WHB 1618, ID 1964 uploaded a signed release to MDL Centrality on August 25, 2025.
18 **Exhibit I** to the Declaration of Walt Cubberly.
- 19 12. Plaintiff WHB 2064, ID 2855 uploaded a signed release to MDL Centrality on June 30, 2025.
20 **Exhibit J** to the Declaration of Walt Cubberly.
- 21 13. Plaintiff WHB 1837, ID 1747 uploaded a signed release to MDL Centrality on September 4, 2025.
22 **Exhibit K** to the Declaration of Walt Cubberly.
- 23 14. Plaintiff WHB 466, ID 1807 uploaded a signed release to MDL Centrality on September 4, 2025.
24 **Exhibit L** to the Declaration of Walt Cubberly.
- 25 15. Plaintiff WHB 1394, ID 1836 uploaded a signed release to MDL Centrality on July 23, 2025.
26 **Exhibit M** to the Declaration of Walt Cubberly.
- 27
28

16. Plaintiff WHB 645, ID 1928 uploaded a signed release to MDL Centrality on September 3, 2025. **Exhibit N** to the Declaration of Walt Cubberly.
17. Plaintiff DMA 1, ID 2130 uploaded production to MDL Centrality on September 4, 2025. **Exhibit O** to the Declaration of Walt Cubberly.
18. Plaintiff WHB 1260, ID 2161 uploaded production to MDL Centrality on September 3, 2025. **Exhibit P** to the Declaration of Walt Cubberly.
19. Plaintiff WHB 2062, ID 2853 uploaded production to MDL Centrality on September 3, 2025. **Exhibit Q** to the Declaration of Walt Cubberly.
20. Plaintiff WHB 2071, ID 2862 cured the production deficiency by uploading her amended, verified PFS to MDL Centrality on September 3, 2025. **Exhibit R** to the Declaration of Walt Cubberly.
21. Plaintiff WHB 1902, ID 1749 cured the production deficiency by uploading a response to question 15 to MDL Centrality on September 3, 2025. **Exhibit S** to the Declaration of Walt Cubberly.
22. Plaintiff WHB 994, ID 1937 uploaded a verified, amended PFS to MDL Centrality on September 3, 2025. **Exhibit T** to the Declaration of Walt Cubberly.
23. Plaintiff WHB 2084, ID 2876 uploaded a verified, amended PFS to MDL Centrality on August 11, 2025. **Exhibit U** to the Declaration of Walt Cubberly.
24. I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on September 5, 2025 in Houston, Texas.

Dated: September 5, 2025

/s/ Walt Cubberly
Walt Cubberly

Attorneys for Plaintiff